

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BERKSHIRE GAS COMPANY

D.T.E. 01-56

ATTORNEY GENERAL'S SIXTH SET OF
DOCUMENT AND INFORMATION REQUESTS

The following is the Attorney General's SIXTH SET of Information Requests in the above referenced docket to be answered in accordance with the instructions already issued by the Attorney General..

- AG-6-1 Please provide a copy of Mr. Allessio's Curriculum Vitae.
- AG-6-2 Referring to page 2, lines 16 through 20 of Mr. Allessio's prefiled testimony, please provide citations in the Company's filing that reflect "a revenue neutral adjustment for base rate recovery of lost base revenues ("LBR") that are currently recovered in the Local Distribution Adjustment Clause."
- AG-6-3 Referring to page 7, lines 11 through 14 of Mr. Allessio's prefiled testimony, please itemize and, where appropriate, quantify the "substantial benefits for customers" that will result from the merger. Please also provide all workpapers, calculations, formulas, assumptions, and supporting documentation.
- AG-6-4 Referring to page 8, lines 4 through 8 of Mr. Allessio's prefiled testimony, please provide all citations to the Department precedent referred to.
- AG-6-5 Referring to page 11 of Mr. Allessio's prefiled testimony, please provide by month, for each month beginning January 2000 to the present, the number of customers added in the Greenfield service territory by rate class. Please also provide for each added customer the expected annual normalized sales.
- AG-6-6 Referring to page 19, lines 15 through 19 of Mr. Allessio's prefiled testimony, please provide citations to all proceedings before the Department supporting his statement that "PCM-type plans have been implemented in a number of mergers considered by the Department."

- AG-6-7 Referring to page 23, lines 21 through 22 of Mr. Allessio's prefiled testimony, please provide a complete and detailed description of how and when customers will "benefit" as a result of the merger. Please also provide all workpapers, calculations, formulas, assumptions, and supporting documentation.
- AG-6-8 Referring to page 24, lines 1 through 2 of Mr. Allessio's prefiled testimony, please provide a complete and detailed description of the guarantees that the Company will make regarding the safety and quality of service to customers during the proposed plan.
- AG-6-9 Referring to page 24, lines 13 through 15 of Mr. Allessio's prefiled testimony, please provide all evidence supporting his statement that Berkshire is a "low-cost distributor of natural gas." Please also provide all workpapers, calculations, formulas, assumptions, and supporting documentation.
- AG-6-10 Referring to page 24, lines 4 through 7 of Mr. Allessio's prefiled testimony, please provide all evidence supporting his statement that there will be "merger-enabled gas commodity cost savings" that will provide economic benefits to gas customers, including a complete and detailed description of specific transactions, identifying the parties to each transaction (e.g. Energy East regulated affiliates, Energy East competitive affiliates, British-Petroleum, etc.). Please also provide all workpapers, calculations, formulas, assumptions, and supporting documentation.

Dated: August 30, 2001.